

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 10-CR-00377-HA

v.

ZERICK DAWSON, and SHAWNTAY
RENEE WILSON,

SECOND SUPERSEDING INDICTMENT

18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(2), 1594(c)

18 U.S.C. § 2423(a), (e)

FILED UNDER SEAL

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy To Sex Traffic A Minor

18 U.S.C. § 1591

A. OBJECT OF THE CONSPIRACY

Beginning on or about July 1, 2010 and continuing through on or about August 1, 2010, in the District of Oregon and elsewhere, **ZERICK DAWSON** and **SHAWNTAY RENEE WILSON**, defendants herein, knowingly and unlawfully conspired and agreed with each other and with **EDWARD BARRINGTON WILLIAMS**, charged elsewhere, and others known and unknown, to do the following acts, while knowing and in reckless disregard of the fact that a female K.G. had not attained the age of 18 years, and would be caused to engage in a commercial sex act:

- (a) **ZERICK DAWSON, SHAWNTAY RENEE WILSON, and EDWARD BARRINGTON WILLIAMS** did, while in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means and

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attempt to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person known as K.G.; and

- (b) **ZERICK DAWSON, SHAWNTAY RENEE WILSON, and EDWARD BARRINGTON WILLIAMS** did benefit, financially and by receiving anything of value, from participation in a venture which engaged in and attempted to engage in the recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means a person known as K.G.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(2) and 1594(7). *SMH*

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON** recruited, enticed, harbored, transported, provided, obtained, and maintained by any means K.G., a minor female, to work as a prostitute and earn money for them in a joint venture.
2. **ZERICK DAWSON and SHAWNTAY RENEE WILSON** instructed K.G. to give money she earned from prostitution activities to others known and unknown to the grand jury.
3. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS and SHAWNTAY RENEE WILSON** took photographs of K.G. and provided photographs of other females to K.G. for the purpose of creating and posting commercial sex advertisements online via the internet.

4. **ZERICK DAWSON, SHAWNTAY RENEE WILSON and EDWARD BARRINGTON WILLIAMS** used and provided credit cards to K.G. so that commercial sex advertisements could be purchased for K.G. online at backpage.com and other online websites.

5. **ZERICK DAWSON and SHAWNTAY RENEE WILSON** provided commercial sex advertisements of K.G. to purchasers online via backpage.com by using and allowing the use of their laptop computer to upload the advertisements via the internet.

6. **SHAWNTAY RENEE WILSON** provided her cell phone number within the commercial sex advertisements so purchasers could contact her to solicit commercial sex acts with K.G.

7. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON** harbored K.G. by renting hotel and motel rooms where defendants and K.G. would sleep, take photographs for commercial sex advertisements, and engage in commercial sex acts.

8. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON** arranged for and transported K.G. to and from the State of Washington and the State of Oregon to perform commercial sex acts.

9. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS and SHAWNTAY RENEE WILSON** communicated with each other and K.G. by cell phones to arrange for the transportation of K.G. so she could engage in commercial sex acts.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy,
ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE

WILSON, and others known and unknown to the Grand Jury, committed various overt acts within the District of Oregon and elsewhere, including but not limited to the following:

1. Beginning on or about July 1, 2010 and continuing through July 29, 2010, **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON** recruited, enticed, harbored, transported, provided, obtained, and maintained by any means K.G., a minor female, to work as a prostitute in a joint venture.
2. In early 2010, **ZERICK DAWSON and EDWARD BARRINGTON WILLIAMS** took photographs of another female identified as M.L. aka, "Topanga", that were used by K.G., on July 5, 2010, in a commercial sex advertisement online at backpage.com.
3. On or about July 5, 2010 **EDWARD BARRINGTON WILLIAMS** provided K.G. with a credit card that was used in a commercial sex advertisement online at backpage.com.
4. On or about July 10, 2010, **EDWARD BARRINGTON WILLIAMS** rented a 1998 Cadillac Catera from an entity identified as "Reliance Transport" in Lakewood, Washington.
5. On or about July 10, 2010, **SHAWNTAY RENEE WILSON** rented a hotel room at the Ramada Inn in Portland, Oregon.
6. On or about July 10, 2010, **ZERICK DAWSON** provided **EDWARD BARRINGTON WILLIAMS** with money for a rental car in the State of Washington.
7. On or about July 10, 2010 **EDWARD BARRINGTON WILLIAMS** drove K.G. from the State of Washington to Portland, Oregon in a 1998 Cadillac Catera for the purpose of engaging in prostitution.

8. On or about July 10 through July 19, 2010, **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS**, and **SHAWNTAY RENEE WILSON** caused K.G. to work as a prostitute.

9. On or about July 10 through August 1, 2010, **ZERICK DAWSON** and **EDWARD BARRINGTON WILLIAMS** accepted monies from K.G. that K.G. earned from engaging in commercial sex acts in Portland, Oregon.

10. Beginning on or about July 12, 2010, and continuing through July 14, 2010, **EDWARD BARRINGTON WILLIAMS** and **SHAWNTAY RENEE WILSON** rented a room at the Howard Johnson hotel in Portland, Oregon.

11. On or about July 15, 2010, **EDWARD BARRINGTON WILLIAMS** rented a hotel room at the Motel 6 in Olympia, Washington.

12. On or about July 16, 2010 **EDWARD BARRINGTON WILLIAMS** drove K.G. from the State of Washington to Portland, Oregon for the purpose of engaging in prostitution.

13. On or about July 16, 2010, **EDWARD BARRINGTON WILLIAMS** rented a hotel room at the Ramada Inn in Portland, Oregon.

14. On or about July 18, 2010, **SHAWNTAY RENEE WILSON** rented a hotel room at the Ramada Inn in Portland, Oregon.

15. Beginning on or about July 20, 2010, and continuing through on or about July 22, 2010, **SHAWNTAY RENEE WILSON** rented a room at the Ramada Inn in Portland, Oregon.

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16. Beginning on or about July 10, 2010 and continuing through on or about July 22, 2010, **SHAWNTAY RENEE WILSON** took photographs of K.G. that were used in online commercial sex advertisements.

17. On or about July 22, 2010 **SHAWNTAY RENEE WILSON** posted a commercial sex advertisement online in Portland, Oregon at backpage.com with photographs of herself and K.G.

18. On or about July 22, 2010 and continuing through July 25, 2010, **EDWARD B. WILLIAMS** rented a hotel room at the Motel 6 in Olympia, Washington.

19. On or about July 26, 2010 **EDWARD BARRINGTON WILLIAMS** rented a hotel room at the Best Western Hotel in Olympia, Washington.

20. On or about July 27, 2010 **EDWARD BARRINGTON WILLIAMS** rented a room at the Motel 6 in Olympia, Washington.

21. Beginning on or about July 27, 2010, and continuing through on or about July 30, 2010, **SHAWNTAY RENEE WILSON** rented a hotel room at the Ramada Inn in Portland, Oregon.

22. Between July 1, 2010 and August 1, 2010 **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS**, and **SHAWNTAY RENEE WILSON**, used cell phones to communicate for the purpose of transporting, harboring, and arranging commercial sex acts for K.G.

23. On or about July 27, 2010, **EDWARD BARRINGTON WILLIAMS** drove K.G. from the State of Washington to Portland, Oregon in a 1998 red Cadillac Catera for the purpose of engaging in prostitution.

24. On about July 27, 2010 **EDWARD BARRINGTON WILLIAMS** and K.G. arrived at the room **SHAWNTAY RENEE WILSON** rented at the Ramada Inn in Portland, Oregon.

25. On or about July 27, 2010, **SHAWNTAY RENEE WILSON** posted a commercial sex advertisement online at backpage.com using her credit card number and photographs of K.G.

26. On or about July 29, 2010, **SHAWNTAY RENEE WILSON** posted a commercial sex advertisement online at backpage.com containing her cell phone number and photographs of K.G.

All in violation of Title 18, United States Code, Section 1591(a)(1), (a)(2), (b)(2) and 1594(a).

COUNT 2
Sex Trafficking of Minor
18 U.S.C. § 1591

Beginning on or about July 1, 2010 and continuing through on or about July 29, 2010, in the District of Oregon and elsewhere, **ZERICK DAWSON**, defendant herein, knowingly did the following acts, while knowing and in reckless disregard of the fact that a female K.G. had not attained the age of 18 years, and would be caused to engage in a commercial sex act:

- (a) Defendant, **ZERICK DAWSON**, did, while in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means and attempt to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person known as K.G.; and

- (b) Defendant, **ZERICK DAWSON**, did benefit, financially and by receiving anything of value, from participation in a venture which engaged in and attempted to engage in the recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means a person known as K.G.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(2) and 1594(a).

COUNT 3
Conspiracy to Transport Minor
18 U.S.C. § 2423

A. OBJECT OF THE CONSPIRACY

Beginning about July 1, 2010 and continuing through about August 1, 2010, in the District of Oregon and elsewhere, , **ZERICK DAWSON and SHAWNTAY RENEE WILSON**, defendants herein, knowingly and unlawfully conspired and agreed with each other and with **EDWARD BARRINGTON WILLIAMS**, charged elsewhere, and others known and unknown, to transport K.G., a person who had not attained the age of 18 years, in interstate commerce with the intent that she engage in prostitution, in violation of Title 18, United States Code, Section 2423(a) and (e).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON** recruited, enticed, harbored, transported, provided, obtained, and maintain by any means K.G., a minor female, to work as a prostitute and earn money for them in a joint venture.

2. **ZERICK DAWSON** and **SHAWNTAY RENEE WILSON** instructed K.G. to give money she earned from prostitution activities to others known and unknown to the grand jury.

3. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS** and **SHAWNTAY RENEE WILSON** took photographs of K.G. and provided photographs of other females to K.G. for the purpose of creating and posting commercial sex advertisements online via the internet.

4. **ZERICK DAWSON, SHAWNTAY RENEE WILSON** and **EDWARD BARRINGTON WILLIAMS** used and provided credit cards to K.G. so that commercial sex advertisements could be purchased for K.G. online at backpage.com and other online websites.

5. **ZERICK DAWSON** and **SHAWNTAY RENEE WILSON** provided commercial sex advertisements of K.G. to purchasers online via backpage.com by using and allowing the use of their laptop computer to upload the advertisements via the internet.

6. **SHAWNTAY RENEE WILSON** provided her cell phone number within the commercial sex advertisements so purchasers could contact her to solicit commercial sex acts with K.G.

7. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS,** and **SHAWNTAY RENEE WILSON** harbored K.G. by renting hotel and motel rooms where defendants and K.G. would sleep, take photographs for commercial sex advertisements, and engage in commercial sex acts.

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8. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON** arranged for and transported K.G. to and from the State of Washington and the State of Oregon to perform commercial sex acts.

9. **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS and SHAWNTAY RENEE WILSON** communicated with each other and K.G. by cell phones to arrange for the transportation of K.G. so she could engage in commercial sex acts.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON**, and others known and unknown to the Grand Jury, committed various overt acts within the District of Oregon and elsewhere, including but not limited to the following:

1. Beginning on or about July 1, 2010 and continuing through July 29, 2010, **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS, and SHAWNTAY RENEE WILSON** recruited, enticed, harbored, transported, provided, obtained, and maintained by any means K.G., a minor female, to work as a prostitute in a joint venture.

2. In early 2010, **ZERICK DAWSON and EDWARD BARRINGTON WILLIAMS** took photographs of another female identified as M.L. aka, "Topanga", that were used by K.G., on July 5, 2010, in a commercial sex advertisement online at backpage.com.

3. On or about July 5, 2010 **EDWARD BARRINGTON WILLIAMS** provided K.G. with a credit card that was used in a commercial sex advertisement online at backpage.com.

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4. On or about July 10, 2010, **EDWARD BARRINGTON WILLIAMS** rented a 1998 Cadillac Catera from an entity identified as "Reliance Transport" in Lakewood, Washington.

5. On or about July 10, 2010, **SHAWNTAY RENEE WILSON** rented a hotel room at the Ramada Inn in Portland, Oregon.

6. On or about July 10, 2010, **ZERICK DAWSON** provided **EDWARD BARRINGTON WILLIAMS** with money for a rental car in the State of Washington.

7. On or about July 10, 2010 **EDWARD BARRINGTON WILLIAMS** drove K.G. from the State of Washington to Portland, Oregon in a 1998 Cadillac Catera for the purpose of engaging in prostitution.

8. On or about July 10 through July 19, 2010, **ZERICK DAWSON, EDWARD BARRINGTON WILLIAMS**, and **SHAWNTAY RENEE WILSON** caused K.G. to work as a prostitute..

9. On or about July 10 through August 1, 2010, **ZERICK DAWSON** and **EDWARD BARRINGTON WILLIAMS** accepted money from K.G. that K.G. earned from engaging in commercial sex acts in Portland, Oregon.

10. Beginning on or about July 12, 2010, and continuing through July 14, 2010, **EDWARD BARRINGTON WILLIAMS** and **SHAWNTAY RENEE WILSON** rented a room at the Howard Johnson hotel in Portland, Oregon.

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13. On or about July 16, 2010, **EDWARD BARRINGTON WILLIAMS** rented a hotel room at the Ramada Inn in Portland, Oregon.

14. On or about July 18, 2010, **SHAWNTAY RENEE WILSON** rented a hotel room at the Ramada Inn in Portland, Oregon.

15. Beginning on or about July 20, 2010, and continuing through on or about July 22, 2010, **SHAWNTAY RENEE WILSON** rented a room at the Ramada Inn in Portland, Oregon.

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17. On or about July 22, 2010 **SHAWNTAY RENEE WILSON** posted a commercial sex advertisement online in Portland, Oregon at backpage.com with photographs of herself and K.G.

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20. On or about July 27, 2010 **EDWARD BARRINGTON WILLIAMS** rented a room at the Motel 6 in Olympia, Washington.

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26. On or about July 29, 2010, **SHAWNTAY RENEE WILSON** posted a commercial sex advertisement online at backpage.com containing her cell phone number and photographs of K.G.

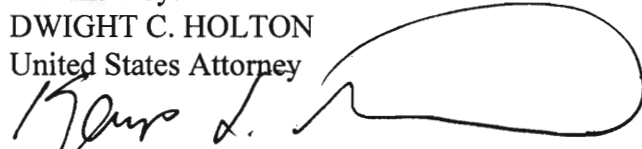
All in violation of Title 18, United States Code, Section 2423(a) and (e)

DATED this 6th day of April 2011.

A TRUE BILL

OFFICIATING FOREPERSON _____

Presented by:
DWIGHT C. HOLTON
United States Attorney

A handwritten signature in black ink, appearing to read "Kemp L. Strickland", is written over a horizontal line.

KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney